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Counsel to Pierce Robertson

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:
In re	:
	:
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,	:
	:
Debtors. ¹	:
-----X	

Chapter 11
Case No. 22-10943 (MEW)
(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, each of the undersigned counsel hereby appears on behalf of claimant, Pierce Robertson (“Claimant”), and requests copies of all notices, pleadings, orders, and other documents brought before this Court with respect to the above-captioned proceedings, whether formal or informal, be served on the Claimant by and through his counsel as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.’s and Voyager Digital Ltd.’s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager Digital, LLC’s principal place of business is 701 S. Miami Ave, 8th Floor, Miami, FL 33131.

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PLEASE TAKE FURTHER NOTICE that this request includes, without limitation (i) all notices and papers referred to in Bankruptcy Rules 2002, 3017, 9007, 9010 and 1109(b), (ii) all notices of hearings and entry of orders, (iii) every order signed in these cases, and (iv) every pleading or report filed in these cases, including, without limitation, schedules, statements of affairs, operating reports, motions, applications, complaints, demands, requests, petitions, plans of reorganization, disclosure statements, answering or reply papers, and memorandum briefs in support of any of the foregoing.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any prior or later appearance, pleading, claim, or suit shall waive any right of Claimant to (1) have final orders in non-core matters entered only after *de novo* review by a District Court judge, (2) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) any objection to the jurisdiction of the Bankruptcy Court for any purpose, (5) any election of remedy, or (6) any other right(s), claim(s), defense(s), setoff(s) or recoupment(s), under agreements, in law, in equity, or otherwise, all of which are expressly reserved.

Dated: September 13, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Jason H. Rosell

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Counsel to Pierce Robertson

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been served by electronic transmission to all registered ECF users appearing in this case.

Dated: September 13, 2022

/s/ Jason H. Rosell

Jason H. Rosell